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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES ROBERT KENNDY,

Defendant.

Case No. 2:18-cr-267-RFB-VCF

**Stipulation to Extend Deadline  
Regarding Production (First Request)  
[ECF 40]**

It is hereby stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney, through Jessica Oliva, Assistant United States Attorney, and Rene L. Valladares, Federal Public Defender, through Brian Pugh, Assistant Federal Public Defender, counsel for Defendant James Robert Kennedy, that the Government's deadline to produce additional materials (ECF 40), currently set for November 19, 2019, be extended to November 26, 2019.

This stipulation is entered into for the following reasons:

1. On November 4, 2019, the Court ordered the Government to produce additional materials by November 19, 2019.

2. The Government has been working diligently but needs additional time to prepare these materials. The extension requested is not sought for purposes of delay, but to allow the Government sufficient time to prepare these materials.

3. This is the first request for an extension of time regarding the production deadline.

4. The parties agree to this extension.

5. Denial of this request for an extension could result in a miscarriage of justice.

DATED this 19th day of November, 2019.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Brian Pugh  
BRIAN PUGH  
Assistant Federal Public Defender  
Counsel for Defendant  
James Robert Kennedy

/s/ Jessica Oliva  
JESSICA OLIVA  
Assistant United States Attorney

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

Case No. 2:18-cr-267-RFB-VCF

4                                   Plaintiff,

5                                   v.

6 JAMES ROBERT KENNEDY,

7                                   Defendant.  
8

9                                   **[Proposed] Order Granting Stipulation to Extend Deadline**

10                                   **Regarding Production (First Request)**

11                                   Based on the pending stipulation of the parties, and good cause appearing, the  
12 stipulation is hereby GRANTED.

13                                   IT IS HEREBY ORDERED that the deadline for the production of additional  
14 materials be extended to November 26, 2019.

15                                   DATED this 20th day of November, 2019.

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HONORABLE RICHARD F. BOULWARE, II  
19 UNITED STATES DISTRICT JUDGE  
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s/ Jessica Oliva  
JESSICA OLIVA  
Assistant United States Attorney